

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CITY OF WARREN POLICE AND FIRE
RETIREMENT SYSTEM, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

WORLD WRESTLING ENTERTAINMENT,
INC., VINCENT K. McMAHON, GEORGE A.
BARRIOS, and MICHELLE D. WILSON,

Defendants.

Civil Action No. 1:20-cv-02031-JSR

**NOTICE OF LEAD PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF PROPOSED CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that Court-appointed Lead Plaintiff, Firefighters' Pension System of the City of Kansas City, Missouri Trust, on behalf of itself and all other members of the proposed Settlement Class, through court-approved Lead Counsel Labaton Sucharow LLP, hereby moves this Court for an Order, pursuant to Federal Rules of Civil Procedure 23(a), (b)(3), and (e): (i) preliminarily approving the proposed Settlement of this securities fraud class action; (ii) preliminarily certifying the Settlement Class for purposes of the Settlement only; (iii) approving the form and manner of providing notice of the proposed Settlement to the Settlement Class, including the procedures and deadlines for objecting, seeking exclusion from the Settlement Class, and submitting Claim Forms; (iv) scheduling a date for the final Settlement Hearing; (v) appointing Epiq Class Action and Claims Solutions, Inc. as the Claims Administrator to administer the Settlement; and (vi) granting such other and further relief as the Court may deem fair and proper. Defendants do not oppose the relief requested in this motion.

This motion is based on the accompanying Memorandum of Law in Support of Lead Plaintiff's Unopposed Motion for Preliminary Approval of Proposed Class Action Settlement and the Declaration of Carol C. Villegas, dated December 23, 2020, with annexed exhibits, filed herewith.

A proposed Order Granting Preliminary Approval of Class Action Settlement, Approving Form and Manner of Notice, and Setting Date for Hearing on Final Approval of Settlement, which was negotiated by the Parties to the Settlement, with annexed exhibits, is also submitted herewith.

DATED: December 23, 2020

LABATON SUCHAROW LLP

/s/ Carol C. Villegas

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*Counsel for Lead Plaintiff Firefighters’
Pension System of the City of Kansas City,
Missouri Trust and the Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2020, I caused the foregoing Notice of Lead Plaintiff's Unopposed Motion for Preliminary Approval of Proposed Class Action Settlement to be served electronically through the Court's ECF system upon all ECF participants.

/s/ Carol C. Villegas
CAROL C. VILLEGAS